## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| DEWARD JOHNSON, et al., | )                        |
|-------------------------|--------------------------|
| Plaintiffs,             | )                        |
| v.                      | ) Case No. 07 C 7036     |
| C.S. JOHNSON, et al.,   | ) Judge Ronald A. Guzman |
| Defendants.             | )                        |

## MOTION FOR EXTENSION OF TIME

Defendants, C.M. Bady (Star #11453), Terry Hillard, Lori Lightfoot, Philip Cline, Tisa Morris, Mayor Richard Daley, and the City of Chicago ("Defendants"), by their attorneys, Terrence M. Burns of Dykema Gossett PLLC, and for their motion for an extension of time to February 25, 2008 to answer or otherwise plead, state as follows:

- 1. Terrence M. Burns of Dykema Gossett PLLC has recently been retained and appeared as counsel for defendants. (Dkt. 21.)
- 2. On January 25, 2008, this Court granted defendant Officer C.S. Johnson's motion for an extension of time to answer or otherwise plead, to and including February 25, 2008. (Dkt. 20.)
- 3. As well as a motion to bifurcate *Monell* discovery, defendants contemplate moving to dismiss certain parties and counts of the Complaint in this case. Defendants' attorneys also request the extension granted to co-defendant Officer C.S. Johnson to meet with the officers relative to the allegations of plaintiffs' Complaint.
- 4. This motion is not presented for purposes of delay but to allow counsel to familiarize themselves with the facts of this matter and prepare appropriate responsive pleadings.
  - 5. No prejudice will be suffered by any party as a result of the requested extension.

WHEREFORE, defendants, C.M. Bady (Star #11453), Terry Hillard, Lori Lightfoot, Philip Cline, Tisa Morris, Mayor Richard Daley, and the City of Chicago, request an extension of time to answer or otherwise plead, to and including February 25, 2008, and for any other relief this Court deems appropriate.

Dated: February 4, 2008

Respectfully submitted,

Terrence M. Burns Paul A. Michalik Daniel M. Noland Dykema Gossett PLLC 10 South Wacker Drive Suite 2300 Chicago, Illinois 60606 (312) 876-1700 s/Daniel M. Noland (ARDC No. 6231175)

One of the Attorneys for Defendants,
C.S. Johnson (Star # 16589), C.M. Bady (Star # 11453), Terry Hillard, Lori Lightfoot, Philip

Cline, Tisa Morris, Mayor Richard Daley, and

the City of Chicago

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2008, I electronically filed the foregoing **Motion for Extension of Time** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to:

Blake Horwitz Law Office of Blake Horwitz 155 North Michigan Avenue Suite 723 Chicago, Illinois 60601 (312) 616-4433 Shneur Z. Nathan City of Chicago 30 North LaSalle Street Chicago, Illinois 60602 (773) 704-1650

s/ Daniel M. Noland (ARDC No. 6231175)

Daniel M. Noland

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